

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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PRO-LIFE ACTION MINISTRIES,  
LUCY MALONEY, THOMAS  
WILKIN, and DEBRA BRAUN,

Case No. 23-CV-00853  
(ECT/DJF)

Plaintiffs,

**PLAINTIFFS' MOTION TO  
COMPEL**

v.

CITY OF MINNEAPOLIS, a  
Minnesota municipality,

Defendant.

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Pursuant to Rule 26(b)(5)(B) of the Federal Rules of Civil Procedure, Plaintiffs hereby move this Court for an Order compelling Defendant to produce documents that it improperly clawed back and documents that it improperly withheld on the basis of attorney-client privilege, as argued in Plaintiffs' accompanying Memorandum. This motion is made pursuant to the Federal Rules of Civil Procedure, District of Minnesota LR 7.1, and upon the files, records, and proceedings herein, as well as the arguments of counsel.

Respectfully submitted, this 12th day of November, 2024.

/s/Nathan Loyd

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